

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

v.

DENNIS L. RIBAUDO SR.,

Defendant.

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) No.
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4 : 12CR00338JCH

INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about October 1, 2010, within the Eastern District of Missouri,

DENNIS L. RIBAUDO SR.,

the defendant herein, did embezzle, steal, purloin, or knowingly convert to his use, and the use of another, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: government funds in the amount of \$1,628.00.

In violation of Title 18, United States Code, Section 641.

COUNT TWO

The Grand Jury further charges:

On or about November 3, 2010, within the Eastern District of Missouri,

DENNIS L. RIBAUDO SR.,

the defendant herein, did embezzle, steal, purloin, or knowingly convert to his use, and the use of another, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: government funds in the amount of \$1,628.00.

In violation of Title 18, United States Code, Section 641.

COUNT THREE

The Grand Jury further charges:

On or about January 4, 2011, in the Eastern District of Missouri, the defendant,

DENNIS L. RIBAUDO SR.,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact, in that, on Form SSA-795, entitled "Statement of Claimant or Other Person," did state and represent and cause to be stated and represented that he did not personally operate a tree business and that his son began operating Denny's Tree Service when he was 16 when in truth and in fact, as **DENNIS L. RIBAUDO SR.,** then well knew, he had been operating Denny's Tree Service by soliciting business, advertising, directing

employees, handling bidding and accounts receivables, and seeking criminal enforcement of debt obligations.

In violation of Title 18, United States Code, Section 1001.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY L. BERRY, 014753 TN
Assistant United States Attorney